

Exhibit 9
L. Franklin August 9, 2023
Deposition Transcript Excerpts

In the Matter Of:

Jane Doe vs

MindGeek USA

LAUREN FRANKLIN

August 09, 2023



1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE CENTRAL DISTRICT OF CALIFORNIA

3 JANE DOE, on behalf of : CIVIL ACTION
4 herself and all others :
5 similarly situated, : NO.
6 : 8:21-cv-00338

7 Plaintiffs, :

8 -against- :

9 MINDGEEK USA :
10 INCORPORATED, MINDGEEK :
11 S.A.R.L., MG :
12 FREESITES, LTD, (d/b/a :
13 PORNHUB), MG FREESITES :
14 II, LTD, MG CONTENT RT :
15 LIMITED, and 9219-1568 :
16 QUEBEC INC. (d/b/a) :
17 MINDGEEK, :

18 Defendants. :

19 CONFIDENTIAL - PROTECTIVE ORDER

20 August 9, 2023

21 Videotaped deposition of
22 LAUREN FRANKLIN, taken in her personal
23 capacity, pursuant to notice, was held at
24 the law offices of Dechert LLP, 1095
25 Avenue of the Americas, beginning at 9:08
a.m., on the above date, before Michelle
L. Gray, a Registered Professional
Reporter, Certified Court Reporter,
Certified Realtime Reporter, and Notary
Public.

1 BY MS. GREGORY:

2 Q. Do you know who made the
3 decision to only allow verified uploaders
4 to post content?

5 A. I don't.

6 MS. GREGORY: I'll mark as
7 Exhibit 68 a press release from
8 MindGeek's website.

9 (Document marked for
10 identification as Franklin
11 Exhibit 68.)

12 BY MS. GREGORY:

13 Q. Ms. Franklin, Exhibit 68 is
14 a press release by Pornhub dated
15 December 14, 2020, correct?

16 A. Yes.

17 Q. Have you seen this press
18 release before?

19 A. Yes.

20 Q. The press release is titled,
21 "The Latest on Our Commitment to Trust
22 and Safety," correct?

23 A. Yes.

24 Q. In what context have you
25 seen this press release before?

1 A. I saw it at the time that it
2 was released. We also added a page
3 similar to this in our trust and safety
4 center.

5 Q. The press release states,
6 "At Pornhub the safety of our community
7 is our top priority. Last week, we
8 enacted the most comprehensive safeguards
9 in user-generated platform history. We
10 banned unverified uploaders from posting
11 new content, eliminated downloads, and
12 partnered with dozens of nonprofit
13 organizations, among other major policy
14 changes. Please read here for more
15 details," correct?

16 A. Yes.

17 Q. Based on this press release,
18 it seems MindGeek banned unverified
19 uploaders on Pornhub around December 7,
20 2020, is that accurate?

21 MS. MASSEY: Object to form.

22 THE WITNESS: It says last
23 week, and the article was
24 posted -- or the blog post was
25 posted on December 14th.

1 BY MS. GREGORY:

2 Q. That would mean the change
3 in practice occurred around December 7,
4 2020, correct?

5 MS. MASSEY: Object to form.

6 THE WITNESS: Based on the
7 math, yes.

8 BY MS. GREGORY:

9 Q. Do you think it was a good
10 idea that MindGeek banned unverified
11 uploaders from posting new content?

12 MS. MASSEY: Object to form.

13 THE WITNESS: I think it
14 made the platform safer to only
15 accept uploads from verified
16 uploaders.

17 BY MS. GREGORY:

18 Q. How did it make the platform
19 safer?

20 MS. MASSEY: Object to form.

21 THE WITNESS: In verifying
22 the user, you know who the user
23 is. You know their age. And
24 given that knowledge, it acts as a
25 deterrent from uploading content

1 that could violate our terms of
2 service.

3 BY MS. GREGORY:

4 Q. How does providing the
5 user's age act as a deterrent from
6 uploading content that could violate your
7 terms of service?

8 A. I said knowing the user's
9 identity acts as a deterrence for
10 violating the terms of service.

11 Q. You also said knowing the
12 user's age acts as a deterrent for
13 violating the terms of service.

14 A. Right. We would know the
15 age because we have the user's
16 government-issued ID.

17 Q. Having the government-issued
18 ID of the performer in the video helps
19 ensure that the performer is over the age
20 of 18, correct?

21 MS. MASSEY: Object to form.

22 THE WITNESS: It helps
23 ensure that the user posting
24 content is over the age of 18.

25 BY MS. GREGORY: